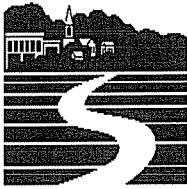


FEB 03 2012

WATER QUALITY PROGRAM



# CITY OF SNOHOMISH

*Founded 1859, Incorporated 1890*

116 UNION AVENUE SNOHOMISH, WASHINGTON 98290 TEL (360) 568-3115 FAX (360) 568-1375

February 2, 2012

Municipal Stormwater Permit Comments  
WA Department of Ecology  
Water Quality Program  
P.O. Box 47696  
Olympia, WA 98504-7696

RE: Western Washington Phase II Municipal Stormwater Draft Permit Comments

Ladies and Gentlemen:

The City of Snohomish would like to thank the Department of Ecology for the opportunity to comment on the Western Washington Phase II Municipal Stormwater Draft Permit (Permit). Snohomish is dedicated to continuing its successful stormwater management program in an effort protect our environment and watercourses despite facing proposed increased Permit responsibilities during a time of decreased staffing and limited program funding.

As with all municipalities, the City of Snohomish has been significantly affected by the current historic economic recession. Snohomish continues to experience decreasing revenue and project funding that has ultimately resulted in staff layoffs, reorganization and decreased funding to many City programs, services and capital projects.

The proposed Permit requirements would require that Snohomish increase staffing and program funding, something a city the size of Snohomish is not prepared to financially support in this economy. The City has already implemented stormwater utility rate increases to its citizens in 2011 as well as previous years to fund stormwater permit requirements and the stormwater utility.

In consideration of the financial burden the proposed Permit presents the City in the current economic climate, the City will be supporting Senate Bill 6207-2011-12 that will provide fiscal relief to cities and counties during periods of economic downturn by providing the issuance of the Permit without modification for an additional three year term (2012-15) in lieu of a one year term (2012-13).

After reviewing the proposed Permit the City concurs with and supports the comments in the Association of Washington Cities (AWC) comment letter in addition to the following major issues of concern:

1. **Outfall Screening**

Location: Page 26, Section S5.C.3.c.i

Comment: Outfall screening is not an effective means to identify illicit discharges. Illicit discharges can be classified as irregular discharges which are discontinuous and random.

Recommendation: Remove this language.

2. **Catch Basin and Inlet Inspections**

Location: Page 37, Section S5.C.5.d: Page 37 Section S5.C5.d.i

Comment: A two year inspection standard, which would include cleaning, of all catch basins and inlets would be unattainable for Snohomish as well as many other small municipalities in a normal economy and even less so in the current economic recession.

Recommendation: Re-instate the five year inspection frequency requirement.

3. **Regional Monitoring**

Location: Pages 51-63, Section S8.C, D and E

Comments: Regional monitoring requirements will create additional financial costs to Snohomish that will be difficult to fund in the current economic climate.

Recommendation: Remove these proposed sections.

4. **Illicit Discharge Definition**

Location: Pages 75

Comments: The current illicit discharge definition would open the City up to potential liability from noncompliance and third party lawsuits. The City cannot control non-point source discharges into the MS4 and the resulting impacts to the MS4 discharge. The text "and infiltration/exfiltration of non-stormwater that takes place in pipe bedding" would also open the City to non-compliance. Snohomish has no control over infiltration/exfiltration of stormwater into pipe bedding.

Recommendation: Remove the words "or from" from the first sentence. Remove the words "and infiltration/exfiltration of non-stormwater that takes place in pipe bedding" from the last sentence.

Again, thank you for the opportunity to review the Western Washington Phase II Municipal Stormwater Draft Permit and submit these comments.

Sincerely,



Larry Bauman  
City Manager

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Cc. Project File